

**SK-1642**

**Public Version**

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Attorneys for Jazz Photo Corp.,

Debtor-in-Possession

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In the Matter of:	:	UNITED STATES BANKRUPTCY COURT
	:	FOR THE DISTRICT OF NEW JERSEY
	:	HONORABLE MORRIS STERN
JAZZ PHOTO CORP.,	:	CASE NO. 03-26565 (MS)
	:	
Debtor-in-Possession.	:	Chapter 11

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**AFFIDAVIT OF JEFFREY KAPLAN IN  
OPPOSITION TO MOTION TO APPOINT  
CHAPTER 11 TRUSTEE**

**HEARING DATE:**

**July 30, 2003, 10:00 a.m.**

STATE OF NEW JERSEY    )  
                                  SS.:  
COUNTY OF MIDDLESEX )

JEFFREY KAPLAN, of full age, being duly sworn according to law, upon his oath,  
deposes and says:

1.       I am an attorney-at-law of the State of New Jersey and a partner in the firm of  
Kaplan & Gilman, LLP. I am familiar with the facts contained herein which are true.

2. I have represented the Debtor, Jazz Photo Corp., in proceedings brought by [

].

3. Because of the outbreak of SARS in the Far East, [ ] was temporarily discontinued because of counsel's inability to travel to the Far East.

4. It is my understanding that Fuji has argued for the appointment of a Chapter 11 Trustee in the Debtor's case, in part, based upon its allegations that [ ] In the event that Fuji seeks to prove these unfounded allegations in the context of the Motion for a Chapter 11 Trustee, I will not be able to adequately respond and defend the Debtor unless [

].

5. Annexed collectively hereto as Exhibit A are true copies of the [

].

6. The [ ]:

(i) [

];

(ii) [

];

(iii) [ ]; and

(iv) [

].

7. In addition, I will not be able to adequately prepare for the hearing unless I can

[ ].

/s/ Jeffrey Kaplan

JEFFREY KAPLAN

Sworn and subscribed to before me  
this 24<sup>th</sup> day of July, 2003.

/s/ Paula M. Halsey

Notary Public of the State of New Jersey

My Commission Expires 1/13/2005

I.D. No. 2173683